

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

CHICAGO ORNAMENTAL IRON, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
SELECTIVE INSURANCE COMPANY OF)	
AMERICA, a New Jersey corporation, and)	No. 1:25-cv-05131
ASSUREDPARTNERS OF ILLINOIS, LLC,)	
an Illinois limited liability company,)	
)	
Defendants.)	
)	
)	
)	

**DEFENDANT ASSUREDPARTNERS OF ILLINOIS, LLC'S
JURISDICTIONAL STATEMENT**

In accordance with the Court's Order issued on May 13, 2025, [Dkt. No. 14], Defendant AssuredPartners of Illinois, LLC ("AssuredPartners"), provides the following supplement to the jurisdictional allegations stated in its Notice of Removal [Dkt. No. 1]:

1. The citizenship of the Plaintiff entities are as follows:
 - a. Plaintiff Chicago Ornamental Iron, Inc. is an Illinois Corporation. According to the records filed with the Illinois Secretary of State, its principal place of business is in Illinois. *See also* Complaint [Dkt. No. 1-1] ¶ 1.
 - b. Plaintiff 4340 W. 47th ST. LLC is an Illinois limited liability company. Its members are Jonathan Samek and Munish Mehta. [Dkt. No. 12]. According to the records filed with the Illinois Secretary of State, both Mr. Samek and Mr. Mehta are citizens of the State of Illinois.

c. Plaintiff 4340 Holdings LLC is an Illinois limited liability company. Its members are Jonathan Samek and Munish Mehta. [Dkt. No. 11]. According to the records filed with the Illinois Secretary of State, both Mr. Samek and Mr. Mehta are citizens of the State of Illinois.

2. Defendant Selective Insurance Company of America is a citizen of New Jersey with its principal place of business in New Jersey.

3. Defendant AssuredPartners is a limited liability company organized under the laws of Illinois. The sole member of AssuredPartners of Illinois, LLC is AssuredPartners Capital, Inc., which is a Delaware corporation with its principal place of business in Florida. [Dkt. No. 1 ¶ 6].

4. Because Plaintiffs are citizens of Illinois, Defendant AssuredPartners is a citizen of Delaware and Florida, and Defendant Selective Insurance Company of America is a citizen of New Jersey, complete diversity of citizenship exists between Plaintiffs and Defendants. *Page v. Democratic Nat'l Comm.*, 2 F.4th 630, 636 (7th Cir. 2021) (“[Complete diversity means] that no party on the plaintiff’s side of the suit shares citizenship with any party on the defendant’s side.”).

WHEREFORE, AssuredPartners requests that the Court accept this jurisdictional supplement to AssuredPartners’s Notice of Removal and for such other and further relief this Court deems just and proper.

Dated: June 4, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 4, 2025, a true and correct copy of the foregoing AssuredPartners's Jurisdictional Statement was filed via the Court's electronic filing system and served via electronic mail upon the following counsel of record:

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